

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

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**JUAN CANEDO,**

**Plaintiff,**

**vs.**

**CASE NO. 3 04 0678**

**TENNESSEE CARPENTERS REGIONAL  
COUNCIL,**

**Defendant**

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**DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

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Comes now Defendant, Tennessee Carpenters Regional Council (hereinafter "Defendant or TCRC"), and hereby files pursuant to Rule 56 of the Federal Rules of Civil Procedure its Motion for Summary Judgment in the above styled action. In support thereof the Defendant submits that the Plaintiff has failed to state a prima facie case of discrimination or retaliation in violation of Title VII of the Civil Rights Act or the Tennessee Human Rights Act. In further support of its Motion, Defendant files the following:

- 1) Memorandum in Support of Motion for Summary Judgment
- 2) Appendix including relevant portions of the Depositions of Juan Canedo, David Trotter Charles Danny Maples and Plaintiff's Response to Admissions.

### III. CONCLUSION

Based upon the above, Defendant respectfully submits that judgment should be granted in its favor and Plaintiff's case dismissed in its entirety.

Respectfully submitted,

s/ Deborah Godwin  
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Attorney for Defendant  
Tennessee Carpenters Regional Council

### CERTIFICATE OF SERVICE

I certify that on August 15, 2005, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to the following: Patricia E. Crotwell, Esq. And Richard J. Braun, Esq.

I further certify that there are no non-CM/ECF participants who would require service by mail in this case.

s/ Deborah Godwin  
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